

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON JANUARY 23, 2024 AT
9:30 A.M. (EASTERN TIME) BEFORE THE HONORABLE KAREN B.
OWENS IN THE U.S. BANKRUPTCY COURT, 824 NORTH MARKET
STREET, 6TH FLOOR, COURTROOM 3, WILMINGTON, DELAWARE 19801**

**AS NO MATTERS ARE GOING FORWARD, THE HEARING HAS BEEN
CANCELLED WITH THE COURT'S PERMISSION**

RESOLVED MATTERS

1. **Second Exclusivity Extension Motion** – Second Motion of the Debtors Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending Exclusive Periods [Filed: 1/8/23] ([Docket No. 871](#)).

Response Deadline: January 16, 2024 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- a) Certification of No Objection Regarding Second Motion of the Debtors Pursuant to 11 U.S.C. § 1121(d) for Entry of an Order Extending Exclusive Periods [Filed: 1/17/24] ([Docket No. 885](#)).
- b) [Signed] Order Pursuant to 11 U.S.C. § 1121(d) Extending Exclusive Periods [Filed: 1/18/24] ([Docket No. 903](#)).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

Status: The order has been entered. No hearing will be necessary.

2. **Second Removal Extension Motion** – Debtors’ Second Motion for Entry of Order (I) Further Extending the Deadline By Which the Debtors May Remove Certain Actions and (II) Granting Related Relief [Filed: 1/8/23] ([Docket No. 872](#)).

Response Deadline: January 16, 2024 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- a) Certification of No Objection Regarding Debtors’ Second Motion for Entry of Order (I) Further Extending the Deadline By Which the Debtors May Remove Certain Actions and (II) Granting Related Relief [Filed: 1/17/24] ([Docket No. 886](#)).
- b) [Signed] Order (I) Further Extending the Deadline By Which the Debtors May Remove Certain Actions and (II) Granting Related Relief [Filed: 1/18/24] ([Docket No. 904](#)).

Status: The order has been entered. No hearing will be necessary.

ADJOURNED MATTERS

3. **Combined Plan and Disclosure Statement** – Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc. and Its Debtor Affiliates [Filed: 12/20/23] ([Docket No. 850](#)).

Response Deadline: December 14, 2023 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Reservation of Rights of the Official Committee of Unsecured Creditors with Respect to the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 10/27/23] ([Docket No. 650](#)).
- b) Objection of the Official Committee of Unsecured Creditors to Confirmation of the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 12/12/23] ([Docket No. 812](#)).
- c) Objection of the United States Trustee to the Confirmation of the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 12/14/23] ([Docket No. 816](#)).
- d) Objection of the Chubb Companies to the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 12/14/23] ([Docket No. 820](#)).

- e) Statement of IV Media LLC in Respect of the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc. and Its Debtor Affiliates [Filed: 12/14/23] ([Docket No. 821](#)).
- f) Objection of Synacor, Inc. to the Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 12/14/23] ([Docket No. 823](#)).

Related Documents:

- a) Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 10/10/23] ([Docket No. 586](#)).
- b) [REVISED] Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 10/27/23] ([Docket No. 655](#)).
- c) Notice of Filing of Blackline of Revised Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 10/27/23] ([Docket No. 656](#)).
- d) Notice of Filing of Exhibit A to Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and its Debtor Affiliates [Filed: 10/31/23] ([Docket No. 673](#)).
- e) Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 11/1/23] ([Docket No. 695](#)).
- f) Notice of Filing of Blackline of Revised Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 11/1/23] ([Docket No. 696](#)).
- g) Certification of Counsel Submitting Revised Order (I) Granting Interim Approval of the Adequacy of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 11/1/23] ([Docket No. 698](#)).
- h) [Signed] Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 11/2/23] ([Docket No. 701](#)).
- i) [SOLICITATION VERSION] Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc., and Its Debtor Affiliates [Filed: 11/2/23] ([Docket No. 706](#)).

- j) Notice of (I) Interim Approval of Disclosures; (II) Hearing to Consider Confirmation of the Combined Plan and Disclosure Statement; (III) Deadline for Filing Objections to Confirmation of the Combined Plan and Disclosure Statement; and (IV) Deadline for Voting on the Combined Plan and Disclosure Statement [Filed: 11/2/23] ([Docket No. 708](#)).
- k) Notice of Filing of Plan Supplement [Filed: 11/30/23] ([Docket No. 779](#)).
- l) Notice of Adjournment of Combined Hearing [Filed: 12/19/23] ([Docket No. 834](#)).
- m) Certification of Counsel Regarding Supplemental Agreed Order Extending Certain Dates Under the Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 12/19/23] ([Docket No. 836](#)).
- n) Supplemental Agreed Order Extending Certain Dates Under the Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving [Filed: 12/20/23] ([Docket No. 846](#)).
- o) Notice of Filing of Blackline of Revised Combined Joint Chapter 11 Plan of Liquidation and Disclosure Statement of Legacy IMBDS, Inc. and Its Debtor Affiliates [Filed: 12/20/23] ([Docket No. 851](#)).
- p) Notice of Filing of Amended Plan Supplement [Filed: 12/20/23] ([Docket No. 852](#)).
- q) Certification of Counsel Regarding Second Supplemental Agreed Order Extending Certain Dates Under the Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 1/3/24] ([Docket No. 868](#)).
- r) [Signed] Second Supplemental Agreed Order Extending Certain Dates Under the Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 1/4/24] ([Docket No. 869](#)).
- s) Notice of Adjournment of Combined Hearing [Filed: 1/19/24] ([Docket No. 908](#)).
- t) Certification of Counsel Regarding Third Supplemental Agreed Order Extending Certain Dates Under the Order (I) Granting Interim Approval of the Disclosures in the Combined Plan and Disclosure Statement; (II) Scheduling a Combined Confirmation

Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief [Filed: 1/19/24] ([Docket No. 909](#)).

Status: This matter has been adjourned to the February 21, 2024 omnibus hearing at 9:30 a.m. Eastern Time.

4. **DIP Agent's Disbursement Motion** – Motion of DIP Agent for an Order Authorizing Disbursement of DIP Expense Advance [Filed: 12/7/23] ([Docket No. 802](#)).

Response Deadline: December 14, 2023 at 4:00 p.m. (Eastern Time).

Responses Received:

- a) Objection of the Official Committee of Unsecured Creditors to Motion of DIP Agent for an Order Authorizing Disbursement of DIP Expense Advance [Filed: 12/14/23] ([Docket No. 819](#)).

Replies Filed:

- a) Reply of DIP Agent in Response to Objection of the Official Committee of Unsecured Creditors to Motion of DIP Agent for an Order Authorizing Disbursements of DIP Expense Advance [Filed: 12/18/23] ([Docket No. 832](#)).

Related Documents: None as of the date hereof.

Status: This matter has been adjourned to the February 21, 2024 omnibus hearing at 9:30 a.m. Eastern Time.

Synacor, Inc. v. IV Media, LLC, et al., Adv. Case No. 23-50753 (KBO)

5. Complaint for Declaratory Judgment [Filed: 11/1/23] ([Docket No. 1](#)).

Response Deadline: December 7, 2023. Extended to January 19, 2024 for Defendants IV Media, LLC and Innovation Ventures, LLC and January 30, 2024 for the Debtor Defendants.

Responses Received: None as of the date hereof.

Related Documents:

- a) Certificate of Service with Summons and Notices of Pretrial Conference in an Adversary Proceeding [Filed: 11/9/23] ([Docket No. 3](#)).
- b) Stipulation By and Between Plaintiff and Defendants Extending Defendants' Time to File an Answer or Respond to Complaint [Filed: 12/6/23] ([Docket No. 7](#)).
- c) Stipulation for Extension of Time to Respond to Complaint for Declaratory Judgment [Filed: 12/6/23] ([Docket No. 8](#)).

- d) Stipulation By and Between Plaintiff and Defendants Extending the Deadline for the Rule 26(f) Conference and Pre-Trial Conference [Filed: 12/15/23] ([Docket No. 10](#)).
- e) [Signed] Order Approving Stipulation By and Between Plaintiff and Defendants Extending the Deadline for the Rule 26(f) Conference and Pre-Trial Conference [Filed: 12/15/23] ([Docket No. 11](#)).
- f) Second Stipulation By and Between Plaintiff and Debtor Defendants Extending Debtor Defendants' Time to File an Answer or Respond to Complaint [Filed: 12/18/23] ([Docket No. 12](#)).
- g) Certification of Counsel Regarding Stipulation and Proposed Order Extending Time for Filing an Answer or Response to Complaint [Filed: 1/4/24] ([Docket No. 17](#)).
- h) Certification of Counsel Requesting Entry of Order Approving Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment [Filed: 1/4/24] ([Docket No. 18](#)).
- i) [Signed] Order Approving Stipulation Extending Time to Answer or Respond to Complaint [Filed: 1/5/24] ([Docket No. 19](#)).
- j) [Signed] Order Approving Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment [Filed: 1/5/24] ([Docket No. 20](#)).
- k) Certification of Counsel Requesting Entry of Order Approving Second Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment [Filed: 1/10/24] ([Docket No. 22](#)).
- l) [Signed] Order Approving Second Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment [Filed: 1/16/24] ([Docket No. 23](#)).
- m) Notice of Extension of Deadline for the Rule 26(f) Conference and Pre-Trial Conference [Filed: 1/18/24] ([Docket No. 24](#)).
- n) Amended Notice of Extension of Deadline for the Rule 26(f) Conference and Pre-Trial Conference [Filed: 1/18/24] ([Docket No. 25](#)).

Status: This matter has been adjourned to the February 21, 2024 omnibus hearing at 9:30 a.m. Eastern Time.

Dated: January 19, 2024
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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